

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 24-11967 (JKS)
)
) (Jointly Administered)
)
) Re: Docket Nos. 16 and 20

**JOINDER AND OBJECTION OF THE GROVE SHOPS LLC TO THE
MOTIONS OF THE DEBTORS TO APPROVE (I) STORE CLOSING
PROCEDURES AND (II) POST PETITION FINANCING**

The Grove Shops LLC (“The Grove Shops” or “Landlord”), by and through its undersigned counsel, hereby files an objection (the “Objection”) both to the *Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Assume the Services Agreement, (II) Authorizing Store Closing Sales and Approving Related Procedures, and (III) Granting Related Relief* [D.I. 16] and to *Motion of Debtors for Entry of Interim and Final Orders, Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, 506, 507, and 552, (I) Authorizing the Debtors to (A) Obtain Senior Secured Superpriority Post-Petition Financing and (B) Use Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Providing Adequate Protection to Prepetition Secured Parties, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief* [D.I. 20] (together, the “Motions”), and in support thereof, respectfully states as follows:

Objection

1. The Grove Shops, is the landlord of a Big Lots store (Store No. 4664) (“Landlord”) located at 90 Shops at 5 Way, Plymouth, Massachusetts, pursuant to a written lease. The Landlord

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the Debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

objects to the Motions as they have the impact of forcing the landlord to bear the burden of maintaining one of the Debtors' stores, helping to preserve the going concern value of the Debtors business operations while assuming the risk that it and other landlords will not be paid administrative claims which have been accruing since the petition date. Landlord hereby adopts, joins and incorporates herein, as if set forth fully herein the reasoning, and arguments raised and asserted and the relief requested by various landlords in the Omnibus Limited Objection of Certain Landlords to Motions of Debtors to Approve (A) Store Closing Procedures and (B) Post - Petition Financing [D.I. 385].

RESERVATION OF RIGHTS

2. Landlord reserves the right to amend and/or supplement this Objection and to raise any additional arguments or objections prior to or at any hearing held in connection with this objection.

JOINDER

3. Landlord hereby joins the objections by other landlords to the Motions to the extent that such objections are not inconsistent with the relief sought herein.

CONCLUSION

WHEREFORE, Landlord respectfully requests the Court enter an order(i) modifying the relief requested in the Motions as requested herein, together with such other and further relief as the court deems just and proper.

Dated: October 2, 2024
Wilmington, Delaware

/s/ Raymond H. Lemisch

Raymond H. Lemisch, Esq. (DE Bar No. 4204)

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